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+ Admitted to Maryland only

James J. Keller*

*Communications engineer
(non lawyer)

August 7, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Mr. William Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: WT Docket No. 97-112
In the Matter of Cellular Service and Other
Commercial Mobile Radio Services in the
Gulf of Mexico
CC Docket No. 90-6
Amendment of Part 22 of the Commission's
Rules to Provide for Filing and Processing
Of Applications for Unserved Areas in the
Cellular Service
Erratum to Reply Comments of
Petroleum Communications, Inc.

Dear Mr. Caton:

On Monday, August 4, 1997, Petroleum Communications, Inc. ("PetroCom") filed its Reply Comments in the above captioned proceedings. Due to an inadvertent error while copying, page 1 of Attachment A (Declaration of James J. Keller) was omitted. Enclosed please find an original and nine copies of the omitted page. Please associate these pages with PetroCom's Reply Comments filed on Monday. If you have any questions regarding this matter, please telephone me at (202) 371-0062. Please stamp received the enclosed file copy of the omitted page and return it with the courier to our office.

Very truly yours,

Jay N. Lazrus
Jay N. Lazrus

Enclosure

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ATTACHMENT A: Declaration of James J. Keller

I, James J. Keller, declare under penalty of perjury as follows.

1. I am a consulting engineer for Petroleum Communications, Inc. ("PetroCom"), one of the cellular licensees authorized to serve the Gulf of Mexico Service Area ("GMSA"). I have prepared this Declaration in support of PetroCom's position in the FCC's rulemaking proceeding regarding amendments to its cellular licensing rules for the GMSA (WT Docket No. 97-112; CC Docket No. 90-6).

2. Based on an extensive review of the FCC's current licensing rules for the GMSA, I have concluded that a main source of conflict between GMSA licensees and cellular carriers licensed for land-based markets adjacent to the Gulf lies in the method by which these two types of carriers are permitted to calculate signal contours that are within 35 miles of the coast line. It has been shown through alternative propagation filings and drive test data filed at the FCC by the land-based carriers that, with sites within 35 miles of the coast line, their coverage is similar to a Gulf carrier's coverage over water. In 1992, the FCC adopted a special formula in Section 22.911(a)(2) to permit GMSA licensees to calculate contours based on the characteristics of signal propagation over water, which predicts a contour where the receive signal averages 28 dBu. Land-based carriers in markets adjacent to the GMSA, however, are allowed to use the standard SAB formula (equivalent to 32 dBu) under Section 22.911(a)(1) even for signal contours that extend over water. Thus land-based carriers have at least a sizeable 4 dB advantage over the GMSA licensees at the service boundaries of their markets and capture traffic within the Gulf carrier's CGSA.

3. PetroCom has proposed a hybrid propagation formula that treats contours extensions in the Gulf area equally, regardless of whether they are generated by a land-based or Gulf carrier. The hybrid propagation formula would not be complex or difficult for a land-based carrier to use. Described below are the steps a land-based carrier would follow to use the hybrid formula:

- A. For sites within 35 miles of the GMSA coast line (as defined by the FCC's rules), calculate a Service Area Boundary (SAB) contour using the formula contained in Section 22.911(a)(2) of the FCC's rules and the associated procedures (See example at Exhibit 1).
- B. Calculate the same SAB contour using the formula contained in Section 22.911(a)(1) and the associated procedures (See example at Exhibit 1).
- C. The SAB contours would be composed of: (i) that portion of the Section 22.911(a)(2) contour extending past the GMSA coast line; and (ii) that portion of the Section 22.911(a)(1) contour for all other areas (See example at

CERTIFICATE OF SERVICE

I, Katrina Blackwell, an employee in Myers Keller Communications Law Group, do hereby certify that on the 7th August, 1997, a copy of the foregoing "ERRATUM TO REPLY COMMENTS OF PETROLEUM COMMUNICATIONS, INC." was hand delivered to the following:

Mr. William Caton, Acting
Secretary
Federal Communications
Commission
1919 M Street, N.W.
Rm.222
Washington, DC 20554

I, Katrina Blackwell, an employee in Myers Keller Communications Law Group, do hereby certify that on the 7th August, 1997, a copy of the foregoing "ERRATUM TO REPLY COMMENTS OF PETROLEUM COMMUNICATIONS, INC." was mailed by First Class U.S. Mail, postage prepaid to the following:

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